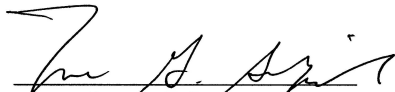


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LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**BY ECF**

Hon. Lorna G. Schofield  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

September 13, 2021

Application **GRANTED**. The deadline for the parties to exchange initial discovery pursuant to the FLSA Initial Discovery Protocols is extended to **October 13, 2021**. The deadline for initial disclosures pursuant to Rule 26(a)(1) is extended to **October 18, 2021**. The initial conference scheduled for **September 23, 2021**, is hereby adjourned to **October 28, 2021**. The parties shall file their proposed CMP and joint letter by **October 21, 2021**. No further extensions will be granted absent extraordinary circumstances.

So Ordered.

Date: September 14, 2021

New York, New York

Re: **Fritz v. Manhattan Beer Distributors LLC, 21-CV-4727 (LGS) (KHP)**  
**Request to Further Extend Time to Exchange Initial Discovery and**  
**to Adjourn Initial Conference**

Dear Judge Schofield:

We represent the Defendant, Manhattan Beer Distributors LLC (“Manhattan Beer”) in the above-identified matter and we write with the consent of counsel for Plaintiff Lambert Fritz, identified in Manhattan Beer records as Fritz Lambert (“Plaintiff”) to request that the Court extend the deadlines for the parties to exchange documents and information pursuant to the Initial Discovery Protocols for Fair Labor Standards Act Cases Not Pleaded as Collective Actions and to serve initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Procedure by thirty (30) days. The new proposed deadlines, if extended, would be:

FLSA Initial Discovery Protocols: October 13, 2021

Rule 26(a)(1) Initial Disclosures: October 18, 2021

Additionally, the parties request that the Court adjourn the initial conference currently scheduled for September 23, 2021 at 11:30 a.m., as well as the related deadline to submit their proposed civil case management plan.

As noted in our prior letter dated July 16, 2021, Plaintiff and Manhattan Beer have agreed to explore resolution of the matter without need for litigation, and the parties believe communications to

Hon. Lorna G. Schofield  
September 13, 2021  
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date signify progress towards that objective. Plaintiff has communicated a settlement demand and Manhattan Beer anticipates responding within the next week. Both parties remain committed to discussing the possibility of settlement, and they wish to avoid the expenditure of time and resources by the Court and parties of preparing and serving discovery materials and/or filing submissions to the Court. Counsel for Plaintiff consents to this extension. This is the third such request, and it affects no other scheduled dates.

Thank you for Your Honor's consideration of these requests.

Respectfully,

*/s/ Adriana S. Kosovych*

Adriana S. Kosovych

cc: Abdul K. Hassan, Esq. (via ECF)